

**UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

STATE OF ALABAMA, et al.,
Plaintiffs-Appellants,

v.

U.S. SECRETARY OF EDUCATION, et al.,
Defendants-Appellees.

Appeal from the U.S. District Court for the
Northern District of Alabama, No. 7:24-cv-533 (Axon, J.)

**APPELLANTS' MOTION FOR
EXTENSION OF TIME TO FILE OPENING BRIEF**

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**CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT**

Per Rule 26.1 and Circuit Rule 26.1, Appellants certify that the following have an interest in the outcome of this appeal:

1. Alabama, State of, *Plaintiff-Appellant*
2. Attorney General's Office of South Carolina
3. Axon, Annemarie Carney, *U.S. District Court Judge*
4. Bachus Brom & Taylor LLC
5. Bernstein, C'Zar, *Attorney for Private Plaintiffs-Appellants*
6. Binnall Law Group
7. Boynton, Brian
8. Brown, Lisa
9. California, State of, *Amicus*
10. Cardona, Miguel, in his official capacity as Secretary of Education, *Defendant-Appellee*
11. Carr, Christopher M., *Attorney for Plaintiff-Appellant Georgia*
12. Consovoy McCarthy PLLC
13. Florida, State of, *Plaintiff-Appellant*
14. Flynn, Shawn M., *Attorney for Amicus Stop Abusive and Violent Environments*
15. Georgia Department of Law
16. Georgia, State of, *Plaintiff-Appellant*
17. Goldfarb, Jon C., *Attorney for Amici States of New Jersey, California, and Pennsylvania*
18. Independent Women's Law Center, *Plaintiff-Appellant*

19. Independent Women's Network, *Plaintiff-Appellant*
20. Kopplin, Rebecca, *Attorney for Defendants-Appellee*
21. Lacour, Jr., Edmund, *Attorney for Plaintiff-Appellant Alabama*
22. Marcus, Stephanie R.
23. Marshall, Steve, *Attorney for Plaintiff-Appellant Alabama*
24. McKasson, Lindsay R., *Attorney for Amicus Stop Abusive and Violent Environments*
25. Miller, Edward A. R., *Attorney for Amicus Stop Abusive and Violent Environments*
26. Moody, Ashley, *Attorney for Plaintiff-Appellant Florida*
27. Myers, Steven A., *Attorney for Defendants-Appellee*
28. New Jersey, State of, *Amicus*
29. Norris, Cameron, *Attorney for Private Plaintiffs-Appellants*
30. North, Benjamin F., *Attorney for Amicus Stop Abusive and Violent Environments*
31. Office of the Attorney General of Alabama
32. Office of the Attorney General of Florida
33. Parents Defending Education, *Plaintiff-Appellant*
34. Patterson, Melissa N., *Attorney for Defendants-Appellee*
35. Pennsylvania, State of, *Amicus*
36. Percival II, James H., *Attorney for Plaintiff-Appellant Florida*
37. Peters, David, *Attorney for Defendants-Appellee*
38. Petrany, Stephen J., *Attorney for Plaintiff-Appellant Georgia*
39. South Carolina, State of, *Plaintiff-Appellant*
40. Spate, Joseph D., *Attorney for Plaintiff-Appellant South Carolina*

41. Speech First, Inc., *Plaintiff-Appellant*
42. Starcher, Jack, *Attorney for Defendants-Appellee*
43. Stop Abusive and Violent Environments, *Amicus*
44. Taylor, Bryan McDaniel, *Attorney for Non-Alabama Plaintiffs-Appellants*
45. The Miller Firm
46. United States Department of Education, *Defendant-Appellee*
47. Vaseliou, Thomas, *Attorney for Private Plaintiffs-Appellants*
48. Whitaker, Henry C., *Attorney for Plaintiff-Appellant Florida*
49. Wiggins Child Pantazis Fisher & Goldfarb
50. Wilson, Alan, *Attorney for Plaintiff-Appellant South Carolina*

Independent Women's Network, Independent Women's Law Center, Parents Defending Education, and Speech First have no parent corporation or corporation that owns 10% or more of their stock. No publicly traded company or corporation has an interest in the outcome of this case or appeal. Per Circuit Rule 26.1-2(c), Appellants certify that the CIP contained in this motion is complete.

Dated: August 2, 2024

/s/ Cameron T. Norris
Counsel for Plaintiffs-Appellants

Appellants respectfully request a 10-day extension to file their opening brief. “[G]ood cause” exists to grant this request. *See* FRAP 26(b); 11th Cir. R. 31-2(a). Appellants’ opening brief is due on September 9. Doc. 37. In the last few days, lead counsel for Appellants learned that he must participate in oral argument for another matter on September 5. Another counsel for Appellants has an oral argument on September 3, and two have three briefs due for another matter on September 9. A short 10-day extension to September 19 would remove these conflicts and give counsel time to adequately brief the important issues in this case, without meaningfully affecting the expedited nature of this case. *See* Doc.47.

Appellants’ “counsel has consulted opposing counsel.” 11th Cir. R. 26-1. Opposing counsel consents “to the relief sought” in this motion. *Id.*

CONCLUSION

For the reasons given, Plaintiffs respectfully request that the deadline to file their opening brief be moved to September 19, 2024.

Dated: August 29, 2024

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Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

This motion complies with Rule 27 because it contains 974 words, excluding the parts that can be excluded. It also complies with Rule 32(a)(5)-(6) because it's prepared in a proportionally spaced face using Microsoft Word 2016 in 14-point Garamond font.

Dated: August 29, 2024

/s/ Cameron T. Norris

CERTIFICATE OF SERVICE

I e-filed this brief, which will email everyone requiring notice.

Dated: August 29, 2024

/s/ Cameron T. Norris